

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re | : Chapter 11 Case No. |
| LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> , | : 08-13555 (JMP) |
| Debtors. | : (Jointly Administered) |
| -----X | |

**SUPPLEMENTAL AFFIDAVIT AND DISCLOSURE STATEMENT
OF DEAN C. WALDT**

ON BEHALF OF BALLARD SPAHR LLP

[illegible]

Dean C. Waldt, being duly sworn, upon his oath, deposes and says:

1. I am a Partner with the firm of Ballard Spahr, LLP, located at 210 Lake Drive East, Suite 200, Cherry Hill, NJ 08002-1163 (the “Firm”).
2. On March 9, 2009, I executed an Affidavit and Disclosure Statement (the “Affidavit”) in support of Debtors’ retention of Ballard Spahr, LL (formerly Ballard Spahr Andrews & Ingersoll, LLP) as ordinary course professionals to provide corporate, real estate and litigation legal services to the Debtors and submitted that Affidavit and a completed Retention Questionnaire (the “Questionnaire”) to the Debtors’ bankruptcy counsel, to be filed with the Court in accordance with the procedures set forth in the order entered November 5, 2008 authorizing the Debtors to employ professionals utilized in the ordinary course of business [Docket No. 1394]. The Debtors subsequently filed the Affidavit and Questionnaire with the Court on March 10, 2009 [Docket No.3035].

3. This affidavit (the "Supplemental Affidavit") supplements the previous Affidavit.

4. The Firm has provided Debtors' counsel with a Supplemental Retention Questionnaire indicating that the Firm represents Woodland Commercial Bank f/k/a Lehman Brothers Commercial Bank ("Woodland") in a litigation matter pending in the First Judicial District for the State of Nevada in and for Carson City in which the adverse party is the State of Nevada, State Board of Finance. The action seeks a declaratory judgment regarding liability under a swap agreement. The Firm represents the State of Nevada in other matters unrelated to this litigation. The Firm's fees in this matter will be paid directly by LBHI, as equity owner of Woodlands.

By:  _____

Subscribed and sworn to before me
this 27th day of September, 2010.


Notary Public

KATHLEEN M. RICH
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES SEPT 9, 2012